

Law Offices of Ronald J. Johnson
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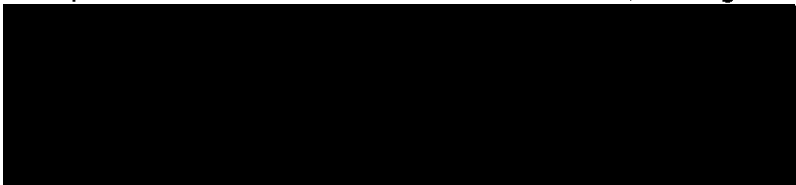
Weinritter Realty, LLC

February 14, 2017

In Reference To: NextStep Development, Inc. v. Weinritter Realty, LP
and Ronald J. Johnson, Substitute Trustee, In the 45th
Judicial District Court of Bexar County

Invoice #2560

Professional Services

		<u>Hours</u>	<u>Amount</u>
1/4/2017	RJJ Telephone conference with Marc Weinstein, asking if	0.25	87.50
			
1/10/2017	RJJ Email to Federal Court Reporters with the transcript order forms to get a preliminary estimate of the Transcript costs. Kindly request expedited service and let them know I will pay the deposit very promptly, as we are on a deadline to receive the Transcripts	0.20	70.00
1/11/2017	KR Preparation of Expedited Transcript Order forms for Hearings held on December 12, 2016 & December 16, 2016. Travel from RJJ Law Office to Bankruptcy court house to file order forms with the Clerk's Office, as no agreement has been reached as to contract and default rate of interest with Debtor's counsel, and an Order Authorizing Sale has not been entered.	1.00	50.00

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		<u>Hours</u>	<u>Amount</u>
1/11/2017	RJJ Email Darla Messina who handles Bankruptcy Court Transcript Orders and attach the Transcript from the First Meeting of Creditors to assist her in the addresses, spelling, and format of names. Send her separate emails with the Outlook contact information for Mr. Kingman, Mr. Hayden and Mr. Pazouki.	0.30	105.00
1/12/2017	RJJ Receipt and review of transcripts of hearings on Sale Motions on December 12 and December 2016, and review, and forward to client, Marc Weinstein.	0.60	210.00
	RJJ Telephone conference with Mr. Kingman to discuss why orders approving the sale had not been submitted.	0.25	87.50
	RJJ Email from Federal Court Reporters asking if I need a hardcopy of the Transcripts. Respond thanking FCR for their very expedited service and payment instructions. Also, inform them I will need a hard copy of the Transcripts, but that it can be mailed.	0.20	70.00
1/13/2017	RJJ Email transcripts of the hearings to Mr. Kingman, debtor's attorney, for his use in preparing the proposed order.	0.10	35.00
1/16/2017	RJJ Lengthy email to Mr. Kingman with Transcripts of the Hearings. Confirm my understanding was that Orders approving the Sale were to be uploaded by January 12, 2017 and that he would let me know whether we were in agreement regarding the default rate. Attach case law which have awarded the default rate and presume that an over-secured creditor is entitled to the default rate.	0.50	175.00
	RJJ Email to client explaining what the issues are with the case and opposing counsel	0.30	105.00
1/17/2017	RJJ Email to Wade Hayden	0.20	70.00
1/19/2017	RJJ Email to Marc Weinstein with case update	0.30	105.00
	RJJ Email to Peter Stanton, attorney for Weinritter on the state court cases, with an update on the Bankruptcy case.	0.30	105.00
1/20/2017	RJJ Review Reports of Operation for December 2016 , filed by Bill Kingman	0.20	70.00

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			<u>Hours</u>	<u>Amount</u>
1/23/2017	RJJ	Email from Jumeida Lopez [REDACTED] [REDACTED]	0.30	105.00
	RJJ	Email with Jumeida Lopez regarding [REDACTED] [REDACTED]	0.30	105.00
	RJJ	Telephone conference with Noelle Cheek of Presidio Title Company	0.10	35.00
1/24/2017	RJJ	Email to Ms. Blott with First draft of Weinritters Motion for Allowance and Payment of interest and Attorneys Fees. Ask Ms. Blott to add citations and case law and to call me to discuss. Review Response from Ms. Blott with clarifications on the work to be done to the Motion.	0.30	105.00
	RJJ	Receive email from Ms. Lopez [REDACTED] [REDACTED]	0.30	105.00
1/25/2017	RJJ	Legal Research and drafting of Weinritter Motion for allowance and payment of post-petition interest and attorneys Feed	6.00	2,100.00
	RJJ	Email to Ms. Blott with cases I have researched to be cited in Weinritter Motion and notes to add to the draft	0.20	70.00
	RJJ	Second Email to Ms. Blott with copies of Transcripts of Hearings from 12-12-16 and 12-16-16, that deal with the sale of real property, which address full payment and ear mark where Mr. Kingman tells the Court he expects an agreement.	0.20	70.00
	RJJ	Telephone conference with Ms. Blott	0.50	175.00
1/26/2017	JWB	Conference call with Ronald J. Johnson regarding proposed Motion for Allowance and Payment of Post-Petition Interest and Attorney's Fees of an Over-Secured Creditor Pursuant to 11 U.S.C. Section	7.50	1,125.00

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Hours Amount

		506; review cases cited and conduct additional research to ensure cases are most recent cases on point in the Western District of Texas; edit facts in support of Motion to reference exhibits and page numbers; review and revise arguments in support of motion.		
1/26/2017	RJJ	Review of the Revised draft of the Motion for Pre-petition Interest and Attorneys' fee, review and revise, and forward to Kathryn Reyes, paralegal for cite check, finalize the motion. Draft proposed Order. Finalize order, for filing by paralegal and service on all parties.	2.50	875.00
	RJJ	Email to Ms. Blott with Payoff amounts and interest.	0.20	70.00
	RJJ	Second Email to Ms. Blott with corrections to her revisions and clarifications	0.20	70.00
	RJJ	Telephone conference with Ms Blott	0.10	35.00
1/27/2017	KR	Revise, Edit, Proofread, File with the Court, and mass mailing to entire matrix at the US Post Office, First-Class Postage of Weinritter Realty's Motion for allowance and Payment of Post-Petition Interest and Attorneys Fees	3.50	175.00
	RJJ	Email to Opposing Counsel Bill Kingman, with Courtesy copy to client, attaching copies of the File stamped Motion for allowance and payment of post petition interest. Respectfully remind Mr. Kingman of our previous conversations regarding uploading orders and a hard deadline of January 20, 2017, before forcing my hand to file a motion for interest at the default rate and reasonable attorney's fees. Point out that I waited an additional 7 days before actually filing and inquire about the Sales approved by Judge Gargotta.	0.40	140.00
	RJJ	Telephone conference with Ms Blott	0.10	35.00
1/31/2017	RJJ	Forward the one word response from Mr. Kingman, as his answer when I asked if there were issues with either sale. Inform them of the Hearing on March 8th for the Motion for allowance and pre payment, set on the docket on this date. Presidio Title still has no closing date and I have been in contact with Mr. Pazouki who represents the buyers.	0.20	70.00

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			<u>Hours</u>	<u>Amount</u>
1/31/2017	RJJ	Telephone conference with client, Daniela Ritter	0.10	35.00
2/1/2017	RJJ	Telephone conference with Noelle Cheek of Presidio Title	0.10	35.00
2/2/2017	RJJ	Review Granting Order regarding Expedited Motion for Authority to Sell Assets Free and Clear of Liens and Final Order regarding the same motion	0.20	70.00
	RJJ	Receipt and review of Order Authorizing Sale of Real Property with closings of February 15, 2017, and providing for payment of an allowed claim of Weinritter realty, and compare to transcript of hearings. The order makes no provision or definition of what an "allowed claim" of Weinritter is, and no proposal for how the claim is to be determined.	0.50	175.00
	RJJ	Email to clients with the Orders authorizing the Sale of Nextstep and Bandera Pointe Hospitality.	0.30	105.00
	RJJ	Telephone conference with Marc Weinstein	0.60	210.00
2/3/2017	RJJ	Telephone conference with Marc Weinstein, [REDACTED]	0.25	87.50
		[REDACTED]		
	RJJ	Telephone conference with Bill Kingman	0.10	35.00
2/6/2017	RJJ	Review email received from Mr. Kingman stating that he has not spoken to his clients' representatives about the expedited setting and will most likely speak to them tomorrow.	0.20	70.00
2/7/2017	RJJ	Telephone conference with David McAllister, Presidio Title, to ask when the closing is scheduled. Mr. McAllister will not release any information without permission of Debtors' attorney, Bill Kingman	0.10	35.00
	RJJ	Telephone conference with Bill Kingman to ask when the closing of both sales will take place. He does not know. Ask for an agreement of an emergency hearing, he "has to confer with his clients".	0.10	35.00
	RJJ	Telephone conference with Wade Hayden, attorney for Kheronsky corporation, buyer of Bandera Pointe property, he said his client is ready to close, and will close on February 15, 2017.	0.10	35.00

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		<u>Hours</u>	<u>Amount</u>
2/7/2017	RJJ Telephone conference with Bill Kingman, for an agreement of the "allowed amount". Mr. Kingman reports he expects to reach an agreement and requested that I hold off filing a motion to expedite.	1.00	350.00
	RJJ [REDACTED]	0.25	87.50
	RJJ Review email from Ms. Lopez asking about the notice of Hearing. Respond letting her know [REDACTED]	0.30	105.00
	RJJ Second email from Ms. Lopez [REDACTED]	0.30	105.00
	RJJ Email from Ms. Lopez asking about the closing and payoff date. [REDACTED]	0.30	105.00
	RJJ Lengthy email to opposing counsel, Bill Kingman with the closing date of February 15th, a date received from Wade Hayden. Spoke to Mr. Pazouki and his client is ready to close. Contract provides for payment of Choice Hotels claim at the time of closing. Suggest an agreed order paying principal and interest and have the funds held in the registry of the Court until the Hearing on March 8, 2017. Weinritter does not object to the debtor paying the franchise claim at closing, as long as Weinritter's claim is paid in full.	0.50	175.00
2/14/2017	RJJ Telephone conference with Robert Pazouki	0.10	35.00
	RJJ Telephone conference with Bill Kingman	0.10	35.00
	RJJ Telephone conference with client Daniela Ritter	0.10	35.00
	RJJ Telephone conference with Marc Weinstein	0.70	245.00

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	<u>Hours</u>	<u>Amount</u>
2/15/2017 RJJ Prepare draft of Motion for Expedited Hearing on Weinritters' Motion for allowance and payment of post petition interest and attorneys fees	2.50	875.00
KR Review, edit, proofread, revise Motion for Expedited Hearing and prepare for filing with Court	1.00	50.00
	<u>37.40</u>	<u>\$9,940.00</u>
For professional services rendered		
Previous balance		\$18,218.50
		<u>\$28,158.50</u>
Balance due		<u><u>\$28,158.50</u></u>